

July 9, 1992

Mary Beth Novy
U.S. Environmental Protection Agency
77 West Jackson Blvd., HSRW-6J
Chicago, IL 60604



RE: ALBION-SHERIDAN QAPP RESPONSE TO QAS COMMENTS

Dear Mary Beth:

This letter has been prepared to respond to final comments on the QAPP and SAP dated June 19, 1992 provided by U.S. EPA QAS. As requested, we have only submitted replacement pages.

QAPP COMMENTS

- II. A. Comment addressed on Page 1-7.
- II. B. Comment addressed on Page 1-7. Additionally, the list of parameters was developed during several scoping sessions which included personnel from the U.S. EPA and MDNR.
- III. Comment addressed on Page 2-5.
- IV. A. Comment addressed on Page 3-1.
- IV. B. Added Page 3-4.
- V. Comment addressed on Page 5-4
- VI. We will contact CRL regarding this comment. The majority of the SAS requests specifically state that they can be used for leachate (BOD, COD, nitrate + nitrite, oil and grease, total organic carbon, sulfate, TKN, TDS, and TSS). Additionally, we have recently used these SAS requests for two other U.S. EPA landfill sites and have not had problems with leachate samples. We did have problems with the labs solicited because they totally disregarded the methods specified (with low, medium and high concentration

samples) but hopefully with the additional language concerning non or partial payment, this problem will be alleviated.

- VII. Comment addressed on Page 9-1.
- VIII. Comment generically addressed on Page 11-1 as recommended by Ms. Jan Pels, RSCC.
- IX. A. Comment addressed on Page 12-1.
- IX. B. Comment addressed on Page 12-2.
- X. A. 1, 2, and 3 Changes made to Table 1
- X. B. Changes made to Table 3
- X. C. Changes made to Table 4
- X. D. Changes made to Table 5
- XI. A. Deleted the analysis of these parameters.
- XI. B. Deleted the analysis of these parameters for that media.
- XI. C. Response to Comment VII, above, applies.
- XI. D. Added this language to all SASs.
- XI. E. Correction made on all SASs.
- XI. F. We are not collecting surface water samples with any equipment, therefore, we will not be collecting any field blanks.
- XI. G. Updated SAS incorporated into revised QAPP.
- XI. H. Updated SAS incorporated into revised QAPP.
- XI. I. Replaced CEC SAS with new SAS provided by Jan Pels, RSCC.
- XI. J. Replaced TCLP SAS with new SAS provided by Jan Pels, RSCC.

- XI. K. Information provided was added to SAS request. Duplicate information deleted.
- XI. L. The updated SASs, CEC and TCLP, are included as part of this submittal, as well as the 3rd page of the TSS SAS request.
- XII. According the RSCC, we can still use the versions that we have in our QAPP. When we run out of that particular version, we will obtain the new forms shown in Addendum's 8 and 9 from the RSCC.

SAMPLING AND ANALYSIS PLAN COMMENTS

- XIII. B. Comment addressed on Page 2-19.
- XIII. C. This information is contained in the Work Plan. Briefly, surface water and sediment samples will be collected to determine the impact to these media from the landfill. Residential wells will be sampled primarily to determine if anyone is consuming contaminated water.
- XIII. D. Comment addressed on Page 2-22.
- XIII. E. This information was added as Appendix C of the QAPP.
- XIII. F. 1. The trip blanks will be analyzed for VOCs only, the associated investigative samples will be analyzed for the Full TCL. These are separated for accounting purposes.
- XIII. F. 2. Comment incorporated on applicable tables.
- XIII. F. 3. Comment incorporated on Table 1.
- XIII. F. 4. Comment incorporated on Table 3.
- XIII. F. 5. Electromagnetic and resistivity testing is not being performed on ground water samples and therefore, this comment has been reviewed but has not been incorporated.
- XIII. F. 6. Field blanks will not be performed on these media and therefore the comment will not be incorporated.
- XIII. F. 7. Comment has already been addressed in comment XIII. F. 2.

XIII. G. 1 These SOPs are included in this submittal.

XIII. G. 2. Comment has been incorporated in resubmitted SOP.

XIII. G. 3. Comment has been incorporated in resubmitted SOP.

XIII. G. 4. Comment has been incorporated in resubmitted SOP.

XIII. G. 5. Comment has been incorporated in resubmitted SOP.

XIII. G. 6. Comment has been incorporated in resubmitted SOP.

XIII. G. 7. Comment has been incorporated in resubmitted SOP.

XIII. G. 8. Comment has been incorporated in resubmitted SOP.

XIII. H. This submittal includes a SOP titled "Field Analyses of Soil Vapor for Volatile Organic Compounds". Sample collection procedures are included in Section 2.11.2. of the SAP.

I did not prepare a comment response letter to your comments dated 5/18/92. Please let me know if you are having difficulty assessing where we addressed those. Thank you for your assistance.

Sincerely yours,

WW ENGINEERING & SCIENCE, INC. ENVIRONMENTAL SERVICES DIVISION

Elyabeth M. Uhl

Elizabeth M. Uhl

Site Project Manager

Enclosure

cc: 04011, 32